

11/1/83
210

A. THOMAS HUNT
WALTER COCHRAN-BOND
TAYLOR, ROTH & HUNT
A Law Corporation
617 South Olive Street
Suite 510
Los Angeles, California 90014
(213) 623-8000

JOHN G. PETERSON
TRABISH & PETERSON
4676 Admiralty Way
Suite 902
Los Angeles, California 90291
(213) 822-2818

Attorneys for Defendant and
Counterclaimant Plaintiff
Church of Scientology of California

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JANE LEE PETERSON and
RICHARD J. PETERSON,

Plaintiffs,

v.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al.,

Defendants.

Civil No. 81-3259-CBM (KX)

MEMORANDUM IN SUPPORT OF
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT

DATE: February 7, 1983
TIME: 10:00 a.m.
COURTROOM: Judge Marshall

CAROL A. GARRITY AND PAUL
GARRITY,

Plaintiffs,

v.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al.,

Defendants.

Civil No. 81-3260-CBM

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

THOMAS JEFFERSON,

Plaintiff,

v.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al.,

Defendants.

DANA LOCKWOOD,

Plaintiff,

v.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA, et al.,

Defendants.

CHURCH OF SCIENTOLOGY OF
CALIFORNIA,

Counterclaimant
Plaintiff,

v.

MICHAEL FLYNN, THOMAS HOFFMAN,
THOMAS GREENE, KEVIN FLYNN,

Counterclaimant
Defendants.

Civil No. 81-3261-CBM

Civil No. 81-4109-CBM

1 "Q. By that mean you mean yes; the answer is yes?

2 "A. Sure. This guy would lay down his life for

3 LRH [L. Ron Hubbard]: no doubt in my mind."

4
5 (Exhibit "A", p. 11, l. 24 - p. 12, l. 2.)

6 Mr. Peterson stated that other Scientologists, other
7 than Mr. Harvey, also made some of the representations which he
8 has alleged were false. These individuals included Lee
9 Landers, Meryl Woodruff, Steve Thompson and Blank Silverman.

10 (Exhibit "A", pp. 13-18.) With regard to the individuals
11 making these representations, Mr. Peterson testified:

12
13 "Q. Did you believe these representations --

14 "A. Sure.

15 "Q. -- at the time they were made to you?

16 "A. Sure, I believed them.

17 "Q. The people who were making them to you, were
18 they sincere that --

19 "A. You better believe they were. I don't think
20 -- I don't think I have met, excluding a couple of
21 G.O. members -- and most of the G.O. members are
22 honest, ethical people. They think they are doing
23 the right thing. Most of them are the most
24 wonderful people I have met. They are very nice,
25 polite. They don't commit crimes. They don't
26 harm you. It is a very ethical group."

27 (Exhibit "A", p. 18, ll. 2-14.)

28 / /

1 Mr. Peterson testified later in his deposition as
2 follows:

3
4 "Q. The people you had contact with were all
5 sincere in the representations they made to you?

6 "A. As far as I know, yes.

7 "Q. The people on up the line you didn't know
8 because you didn't have contact with them; is that
9 what you mean?

10 "A. Exactly."

11 (Exhibit "A", p. 20, ll. 12-17.)
12

13 3. The Testimony of Jane Lee Peterson.
14

15 Concerning her allegations of fraud, Plaintiff Jane
16 Peterson similarly testified as follows at her deposition:
17

18 "Q. Let me ask you a different question. The
19 people who you listed -- Mr. Landers, Woodruff,
20 Hammond, Harvey, and Mary Gay and so on -- who
21 made the representations to you that if you got
22 into Scientology you'd get these various benefits
23 -- did they seem sincere to you at the time that
24 they made these representations?

25 "A. Do you mean at the time did I think they were
26 sincere?

27 "Q. Well, that's a good question. Let's start
28 with that one.